

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

Robert Manchel, Esq.  
1 Eves Drive, Suite 111  
Marlton, NJ 08053  
Attorney for Debtor  
RM-1141

In Re:

Kimberly J. English

Case No. 18-33147ABA

Judge:

Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

**X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

**TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following  
(**choose one**):

1.   X   Motion for Relief from the Automatic Stay filed by MidFirst Bank,  
creditor. A hearing has been scheduled for 12/17/2019, at 10:00 a.m.

OR

           Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has  
been scheduled for                                  at        a.m.

OR

           Certification of Default filed by                 , creditor. I am requesting that a  
hearing be scheduled on this matter.

OR

           Certification of Default filed by Standing Chapter 13 Trustee.  
I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

\_\_\_\_\_ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

OR

\_\_\_\_\_ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

**X** Other: I will cure all arrears through and including November 2019 immediately and will resume regular monthly mortgage payments as of December 2019. I respectfully request that the movant's motion be denied so that I may continue and complete my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 11/27/2019

/s/ Kimberly J. English  
Kimberly J. English, debtor